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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

Plaintiff,

Defendant.

v.

Case No: 1:24-CR-00135-NODJ-BAM

STIPULATION TO MODIFY TERMS & CONDITIONS OF RELEASE; ORDER

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15 JASON MOTT,

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It is hereby stipulated by and between the parties, defendant Jason Mott through his attorney, Galatea DeLapp, and plaintiff United States of America, through Assistant U.S. Attorney Robert

Veneman-Hughes, that the Pretrial Release Order¹ be amended to authorize defendant to be away from his residence from 5:01 AM until 8:59 PM. His new curfew would be between 9:00 PM until 5:00 AM.

The defendant has obtained employment with a major commute period. His Pretrial Services officer has

confirmed that this revised curfew is necessary and reasonable.

The defendant has successfully complied with all previously ordered conditions and is doing

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¹ The United States opposed release at the defendant's bail review hearing. Its agreement here to a reasonable modification of defendant's release conditions is not a concession at any future detention hearing to the appropriateness of the defendant's release.

1	well in the Better Choices Program.	
2	Pretrial Services has agreed to this stipulation.	
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4	IT IS SO STIPULATED.	
5	Dated: January 24, 2025	MICHELE BECKWITH Acting United States Attorney
6		By: /s/ Robert Veneman-Hughes
7		Robert Veneman-Hughes
8		Assistant United States Attorney
9	Dated: December 24, 2025	By: /s/ Galatea R. DeLapp Galatea R. DeLapp, Esq.
10		Attorney for Defendant
11		Jason Mott
12	ORDER	
13	Based upon the stipulation of the parties, and good cause appearing therefore, IT IS APPROVED AND SO ORDERED.	
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16	IT IS SO ORDERED.	
17	Dated: January 24, 2025	/s/Barbara A. McAuliffe
18		UNITED STATES MAGISTRATE JUDGE
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